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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAR 21 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Streamlining the Commission's)
Antenna Structure Clearance)
Procedure)

and)

WT Docket No. 95-5

Revision of Part 17 of the)
Commission's Rules Concerning)
Construction, Marking,)
and Lighting of Antenna)
Structures)

To: The Commission

COMMENTS
OF THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.

The Industrial Telecommunications Association, Inc. ("ITA"), pursuant to the Federal Communications Commission's Notice of Proposed Rule Making in the above-referenced matter, hereby respectfully submits these Comments responsive to the Commission's proposal.¹

¹ Notice of Proposed Rule Making (FCC 95-16), WT Docket No. 95-5, adopted January 12, 1995, released January 20, 1995, (hereinafter "Notice").

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List A B C D E

I. PRELIMINARY STATEMENT

1. ITA, formerly the Special Industrial Radio Service Association, Inc. (SIRSA), is an association organized under the laws of the District of Columbia. ITA is the Commission's certified frequency coordinator for the Special Industrial Radio Service and the Industrial/Land Transportation 421-430 MHz and 800/900 MHz frequency pools. ITA also coordinates channels from the 800 MHz General Category pool for those entities: (a) eligible to become Industrial/Land Transportation licensees; (b) wishing to expand trunked systems; or (c) consolidating conventional systems into a trunked system. ITA coordinates in excess of 6,000 applications per year on behalf of applicants seeking Commission authority to operate radio stations on frequency assignments allocated to the Special Industrial Radio Service and the enumerated 800/900 MHz frequency pools.

2. ITA enjoys the support of a membership that includes more than 8,600 private land mobile radio communications licensees and the following trade associations:

- Alliance of Motion Picture and Television Producers
- American Mining Congress
- Associated Builders & Contractors, Inc.
- Florida Citrus Processors Association
- Florida Fruit & Vegetable Association
- National Aggregates Association
- National Food Processors Association
- National Propane Gas Association
- National Ready-Mixed Concrete Association
- National Utility Contractors Association

New England Fuel Institute
United States Telephone Association

II. COMMENTS

3. ITA enthusiastically supports the Commission's proposal to institute a uniform registration program for the owners of antenna structures. The proposal would rectify many of the impediments in the current antenna tower clearance procedures. Clearly, it would help to simplify the work of applicants in preparing applications.

4. ITA endorses the proposal to impose upon antenna structure owners the responsibility for: (1) registering the antenna structure with the FCC; (2) maintaining the painting and lighting of the antenna structure; (3) notifying the Commission of any changes in height, ownership, coordinates, painting or lighting of the structure; and (4) providing notice to the Commission when the structure is dismantled. Implementation of the proposed program would relieve licensees who do not own their antenna structures of the responsibility of obtaining tower clearance, ensuring compliance with the painting and lighting requirements, and notifying the Commission of changes to the structure. In ITA's view, the proposed changes would serve the public interest, result in more efficient administration of the antenna structure database and promote the safe and efficient operation of antenna structures.

5. ITA believes that the Commission, when establishing the new antenna structure database, should permit users a variety of alternatives for accessing the database. It is probably necessary, as the Commission has suggested, to provide hard-copy updates on a quarterly basis. At the same time, however, the Commission must recognize that users will also require the ability to access the database using more sophisticated mediums, including CD-ROM and direct, on-line access. ITA encourages the Commission to recognize that on-line access to the database is, in the current era, virtually imperative. On-line access methods would allow users to retrieve the most recent and most reliable data available and would enhance the integrity of applications for station licenses.

6. Similarly, ITA enthusiastically supports the effort to permit structure owners to register their towers electronically. ITA believes that, over the next five years, the electronic filing of FCC applications will become standard. Antenna structure registrations present an opportunity for the Commission to demonstrate the many advantages offered through electronic filing. These advantages include improved timeliness in the availability of antenna structure information, more reliable structure information, the potential for automatic update of the

database rather than manual updating, and elimination of the potential for delays or loss of mail within the postal system.

WHEREFORE, THE PREMISES CONSIDERED, the Industrial Telecommunications Association, Inc. respectfully submits these Comments and urges the Federal Communications Commission to act in accordance with the views expressed herein.

**INDUSTRIAL TELECOMMUNICATIONS
ASSOCIATION, INC.**

By: 

Mark E. Crosby
President and Chief Executive
Officer

By: 

Frederick J. Day, Esq.
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Date: March 21, 1995